

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROBERT HARRISON,

Plaintiffs,

-against-

GRZEGORZ WNOROWSKI, CARLOS EUGENE SALAS
and NAVAJO EXPRESS INC.,

Defendants.
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Case No:
Magistrate Judge:

Judge:

NOTICE OF REMOVAL

The defendants, **CARLOS EUGENE SALAS and NAVAJO EXPRESS INC.**,
(hereinafter “defendants”), remove this action from the Supreme Court, Queens County to the
United States District Court for the Eastern District of New York.

1. The plaintiff commenced this action against defendants, in the Supreme
Court of the State of New York, Queens County. A copy of the amended complaint is attached as
Exhibit A. The Complaint was filed in State Court on December 23, 2021 and served on
defendants Salsa and Navajo on or about November 20, 2022.

2. The plaintiff ROBERT HARRISON is a citizen of the State of New York
and was a citizen of the State of New York when this action was started in state court.

3. The defendants are citizens of a state other than the State of New York and
were citizens of a state other than the State of New York when this action was started in state court.

a) GRZEGORZ WNOROWSKI is and was a citizen of the state of Connecticut
residing at 190 Kent Road, Warren, CT 16754:

b) **CARLOS EUGENE SALAS** is and was a citizen and resident of the state
of Texas residing at 2129 S Loop 289, Lubbock, TX 79423.

c) Navajo Express, Inc. is (and was) an Colorado corporation with its principal
place of business in the State of Colorado.

4. Plaintiff is claiming damages in excess of \$75,000. Per plaintiff's response to Demand for Statement of Damages dated July 12, 2022 plaintiff is claiming damages in the sum of \$10,000,000 (Annexed hereto as **Exhibit "B"**).

5. This Court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started—is between citizens of different states and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

6. This petition is being filed more than 30 days from our client's receipt of the Summons & Complaint because no indication of the amount in controversy was provided in the complaint. As stated above, we only recently received the information necessary to represent to the Court that the amount in controversy exceeds \$75,000.

7. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the District Courts of the United States have original jurisdiction that is brought in a state court.

8. All defendants join in the removal of this action to this Court.

Dated: New York, New York
July 20, 2022

Yours, etc.,

RAWLE & HENDERSON LLP



By:

ROBERT A. FITCH
RAWLE & HENDERSON LLP
Attorneys for Defendants
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NAVAJO EXPRESS INC.**
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TO: Via NYSCEF

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